

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

## **NORTH AMERICAN SALT COMPANY)**

## **MOTION FOR ENTRY OF SUMMARY JUDGMENT ORDER**

Plaintiff North American Salt Company (“NASC”), by and through its attorney F. John McGinnis, moves this Court for entry of summary judgment order pursuant to Fed. R. Civ. P. 56 against L.P.N.D., Inc. and in support thereof states as follows:

1. On March 9, 2010, North American Salt Company filed its motion for summary judgment against L.P.N.D., Inc., together with its Statement of Undisputed Facts and its Memorandum.

2. On March 11, 2010, this Court entered a briefing schedule on the motion requiring the response to the motion to be filed on or before April 9, 2010.

3. On March 24, 2010 counsel for North American Salt Company received a fax from counsel for L.P.N.D. Inc. stating that L.P.N.D. Inc. would not be filing a response to the motion for summary judgment and that North American Salt Company should prepare an agreed judgment order. A copy of the fax is attached hereto as Exhibit A.

4. On or about March 29, 2010 counsel for North American Salt Company forwarded to counsel for L.P.N.D., Inc. a copy of the Judgment Order attached hereto as Exhibit B. Counsel for L.P.N.D., Inc. stated that he had no objection to the order.

WHEREFORE North American Salt Company prays that this Court enter the Judgment Order attached hereto as Exhibit B on its summary judgment motion against L.P.N.D., Inc.

NORTH AMERICAN SALT COMPANY

By: s/ F. John McGinnis

F. John McGinnis  
105 West Madison Street  
Suite 2100  
Chicago, IL 60602  
312-223-1111  
312-223-1112 Fax  
[john@jmclaw.com](mailto:john@jmclaw.com)  
Illinois Bar No. 1839446

**CERTIFICATE OF SERVICE**

F. John McGinnis, an attorney, certifies that I served this **MOTION FOR ENTRY OF SUMMARY JUDGMENT ORDER** on the below persons at the below addresses by ECF service.

Robert D. Rotman  
Rotman & Elovitz, Ltd.  
180 N. LaSalle St., Ste 2101  
Chicago, IL 60601

s/ F. John McGinnis

F. John McGinnis  
105 West Madison Street  
Suite 2100  
Chicago, IL 60602  
312-223-1111  
312-223-1112 Fax  
[john@jmclaw.com](mailto:john@jmclaw.com)  
Illinois Bar No. 1839446